GOOGLE LLC'S OBJECTIONS TO SPECIAL MASTER'S REPORT

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QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice)*
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of themselves and all others similarly situated, Plaintiffs, vs. GOOGLE LLC, Defendant.	Case No. 4:20-cv-03664-YGR-SVK **GOOGLE LLC'S OBJECTIONS TO SPECIAL MASTER'S REPORT AND RECOMMENDATION ON REFERRED DISCOVERY ISSUES (PRESERVATION PLAN)** Referral: Hon. Susan van Keulen, USMJ

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Pursuant to the Court's April 4, 2022 Order (Dkt. 526), Google hereby provides its objections to the Special Master's Report and Recommendation on Referred Discovery Issues (Preservation Plan). Dkt. 524.

		SPECIAL MASTER ORDER			GOOGLE'S OBJECTIONS
Index	Log Source	Data Source	Possible Duplicate Data Source	Alternate Name or Notes	
1	Analytics Log	███████ ███████		This Data source name may have been truncated. If there are more than 3 data sources with this "root", please advise Plaintiffs and they may select up to three of these data source for preservation in the same manner as the other data sources identified herein. This data source may have been provided in the 9/17/21 submission as ███████ ███████ ███████ ██a	Google agrees to preserve data from ███████ ███████ .[1] Google objects to the additional instruction under "Alternate Name or Notes" that unspecified data sources be identified and selected. The name under "Data Source" is not a root, but rather a truncated name of a particular log: ███████ ███████ . Plaintiffs identified this log in a related March 8, 2022 email: "Plaintiffs will select three sample IDs for each type of log: ███ i-logs, Gaia-logs, and Search-logs, for the ███████ searches to flesh out the schema, in addition to Google fleshing out the schema for (i) ███████ , (ii) ███████ , (iii) ███████ , (iv) ███████ logs." Given the clear intent to identify a particular log, there is no reasonable ground to order Google to identify all logs that share a particular root.
2	Display Ads Logs	███████ ███████			No objection.

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[1] Google previously proposed to preserve a daily sample of 1,000 Display Ads events associated with 1,000 different randomly selected UIDs scoped to activity in the United States. The Special Master's recommendation that Google "preserve all records for 10,000 randomly selected US based IDs … for each day for which there is data" sweeps in significantly more data and requires more storage. However, Google will not object if it will provide final resolution to the preservation issue.

3	Display Ads Logs	████████████			No objection. Google agrees to preserve data from ████████████
4	Display Ads Logs	████████████ ██	7		No objection. Google agrees to preserve data from ████████████
5	Display Ads Logs	████████████ ███	8		No objection. Google agrees to preserve data from ████████████e.
6	Display Logs	██████ ██████			No objection. Google agrees to preserve data from ████████.
7	Display Logs	████████████ ███	4		No objection. Google agrees to preserve data from ████████████. Google confirms this data source is a duplicate of row 4.
8	Display Logs	██████████ █████	5		No objection. Google agrees to preserve data from ████████████. Google confirms this data source is a duplicate of row 5.
9	Display Logs	██████████ █████			No objection. Google agrees to preserve data from ████████████te.
10	GAIA Logs	██████████ ████			Google objects to preserving data from this log ███████-████████). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
11	GAIA Logs	██████████ ████			Google objects to preserving data from this log ████████ ████████). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
12	GAIA Logs	██████████ ████			Google objects to preserving data from this log (████ ████████).

					The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
13	GAIA Logs	███████ ██████	25		Google objects to preserving data from this log ████ █████████████████). The source is a personal log (or P-log) pertaining to Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining to Gmail Ads is outside of the case scope because: (1) Plaintiffs' class definition is expressly limited to signed out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192); and (2) up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs' purported class was specifically limited to individuals "who accessed a non-Google website containing Google Analytics or Ad Manager." Dkt. 136-1 (SAC), ¶ 192.
14	GAIA Logs	████████ ████████ █████	26		Google objects to preserving data from this log (████ ████████████████). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
15	GAIA Logs	████████ ██████	27		Google objects to preserving data from this log (████ ████████████). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.

1					Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
2 / 3 / 4 / 5 / 6 / 7	16	GAIA Logs	███████ ██████	28	This Data source name may have been truncated. If there are more than 3 data sources with this "root", please advise Plaintiffs and they may select up to three of these data source for preservation in the same manner as the other data sources identified herein	Google objects to preserving data from this log (██████-████████).

The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192. |
| 8 / 9 / 10 / 11 / 12 | 17 | GAIA Logs | ████████ ████████ ████ | 29 | | Google objects to preserving data from this log ████████ ████████████████).

The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192. |
| 13 / 14 / 15 / 16 / 17 / 18 | 18 | GAIA Logs | ████████ ████████ ████ | 30 | | Google objects to preserving data from this log (██████-████████e).

The source is a personal log (or P-log) pertaining to Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining to Gmail Ads is outside of the case scope because: (1) Plaintiffs' class definition is expressly limited to signed out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192); and (2) up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs' purported class was |

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					specifically limited to individuals "who accessed a non-Google website containing Google Analytics or Ad Manager." Dkt. 136-1 (SAC), ¶ 192.
19	GAIA Logs	▓▓▓▓ ▓▓▓▓ ▓▓▓▓ ▓	31		Google objects to preserving data from this log ▓▓▓▓ ▓▓▓▓ ▓▓▓▓ ▓▓▓▓). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
20	GAIA Logs	▓▓▓▓ ▓▓▓▓ ▓▓	32		Google objects to preserving data from this log (▓▓▓ ▓▓▓▓▓▓▓▓). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
21	GAIA Logs	▓▓▓▓ ▓▓▓▓ ▓▓	33		Google objects to preserving data from this log (▓▓▓▓▓▓▓▓▓▓). The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
22	GAIA-Keyed Logs	▓▓▓▓ ▓▓▓▓			Google confirms this data source is a duplicate of row 10. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because

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					Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
23	GAIA-Keyed Logs	████████ ████████			Google confirms this data source is a duplicate of row 11. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
24	GAIA-Keyed Logs	████████ ████████	12		Google confirms this data source is a duplicate of row 12. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
25	GAIA-Keyed Logs	████████ ████████	13		Google confirms this data source is a duplicate of row 13. Google objects to preserving data from this log. The source is a personal log (or P-log) pertaining to Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining to Gmail Ads is outside of the case scope because: (1) Plaintiffs' class definition is expressly limited to signed out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192); and (2) up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs' purported class was specifically limited to individuals "who accessed a non-Google website containing Google Analytics or Ad Manager." Dkt. 136-1 (SAC), ¶ 192.

26	GAIA-Keyed Logs	███████ ████████ ████	14		Google confirms this data source is a duplicate of row 14. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
27	GAIA-Keyed Logs	███████ ████████	15		Google confirms this data source is a duplicate of row 15. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
28	GAIA-Keyed Logs	███████ █████	16		Google confirms this data source is a duplicate of row 16. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
29	GAIA-Keyed Logs	███████ ████████ ████	17		Google confirms this data source is a duplicate of row 17. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.

30	GAIA-Keyed Logs	███████	18		Google confirms this data source is a duplicate of row 18. Google objects to preserving data from this log. The source is a personal log (or P-log) pertaining to Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining to Gmail Ads is outside of the case scope because: (1) Plaintiffs' class definition is expressly limited to signed out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192); and (2) up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs' purported class was specifically limited to individuals "who accessed a non-Google website containing Google Analytics or Ad Manager." Dkt. 136-1 (SAC), ¶ 192.
31	GAIA-Keyed Logs	███████	19		Google confirms this data source is a duplicate of row 19. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
32	GAIA-Keyed Logs	███████	20		Google confirms this data source is a duplicate of row 20. Google objects to preserving data from this log. The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
33	GAIA-Keyed Logs	███████	21		Google confirms this data source is a duplicate of row 21. Google objects to preserving data from this log.

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					The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
34	Other Ads Logs	██████████ █			No objection. Google agrees to preserve data from ██ ██████████.
35	Other Ads Logs	████████			No objection. Google agrees to preserve data from ██████████.
36	Other Ads Logs	█████████		████████	No objection. Google agrees to preserve data from ██████████.
37	Other Ads Logs	████ ████████			No objection.
38	Search Ads Logs	████ ████████			No objection.
39	Search Ads Logs	████ █████████ ██████			No objection.
40	Search Logs	█████████ ██████			No objection. Google agrees to preserve data from ████████████████. Google confirms this data source is a duplicate of row 37.
41	Search Logs	████████ ██████			No objection. Google agrees to preserve data from ████████████████. Google confirms this data source is a duplicate of row 38.
42	Search Logs	████████ ███████			Google agrees to preserve data from ████████ ████████████. This truncated log name ("██████████████████████") appears to be taken from Plaintiffs' March 16, 2022 submission to the Special Master titled "2022-03-16 Top 10 Fields BSF." In this submission Plaintiffs selected fields for which Google was to provide values from 23 logs, including ███████ ████████████████████ The full log name that Google

					disclosed on March 1, 2022 as one of the ▓▓▓▓ logs is: ▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓. However, Google clarified on March 4, 2022 that the correct name for this ▓▓▓ log is ▓▓▓▓ ▓▓▓▓▓▓▓▓▓▓▓ (not ▓▓▓▓▓▓).
43	▓	▓▓▓▓			No objection.
44	▓▓	▓▓▓▓			Google objects to preserving data from this keyspace.

The keyspace is only written when a user is signed in to a Google Account. Data in this GAIA-keyed keyspace is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192. |
| 45 | ▓ | ▓▓▓ | | | Google objects to preserving data from this keyspace.

The keyspace is only written when a user is signed in to a Google Account. Data in this GAIA-keyed keyspace is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192. |
| 46 | Unknown | ▓▓▓ | | | No objection. Google agrees to preserve the ▓▓▓▓ dashboard data, which is based on ▓▓▓▓▓▓▓▓▓▓▓ and ▓▓▓▓▓▓▓▓▓▓ boolean fields. |
| 47 | ▓▓ | ▓▓▓▓▓ ▓▓▓ | | | Google objects to preserving data from this log source for this matter.

This log writes information when a user is signed into the Chrome browser and into a Google Account in the content area, and is used to debug production problems and compute aggregated product metrics. Because this log relates to Chrome sync, it is irrelevant for this matter. Data in this data source is outside of the case scope because Plaintiffs' class definition is expressly limited to |

					signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
48	▓▓▓▓	▓▓▓▓			Google objects to preserving data from this log source for this matter. This log writes information when a user is signed into the Chrome browser and into a Google Account in the content area, and is used to debug production problems and compute aggregated product metrics. Because this log relates to Chrome sync, it is irrelevant for this matter. Data in this data source is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
49	▓▓▓▓	▓▓▓▓			Google objects to preserving data from this log source for this matter. This log writes information when a user is signed into the Chrome browser and into a Google Account in the content area, and is used to debug production problems and compute aggregated product metrics. Because this log relates to Chrome sync, it is irrelevant for this matter. Data in this data source is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
50	Unknown	UMA Logs			No objection.
51	▓▓▓▓	▓▓▓▓			Google objects to preserving data from this keyspace for this matter. ▓▓▓▓ is not one of the relevant data sources identified for this matter, because up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs' purported class was specifically limited to individuals "who accessed a non-Google website containing Google

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					Analytics or Ad Manager." SAC, Dkt. 136-1 ¶192. ▮▮▮▮▮ does not store data generated when users visit a third-party website that uses Google Analytics or Ad Manager. Additionally, the Court ordered that "given plaintiffs' representations that amendment would not impact discovery in this case, plaintiffs may not rely on their newly revised class definitions to: … Seek additional or supplemental document productions; Request that Google supplement any of its discovery responses." TAC, Dkt. 504 at 2.
52	Unknown	▮▮▮			No objection. However, as of March 11, 2020, this log no longer collects data.
53	Unknown	▮▮▮▮			No objection.
54	Unknown	▮▮▮▮			No objection.
55	Unknown	▮▮▮			No objection. Google confirms this data source is a duplicate of row 35.
56	Unknown	▮▮			No objection.
57	Unknown	▮▮▮			No objection.
58	Unknown	▮▮▮			No objection.
59	Unknown	▮▮▮			No objection.
60	Unknown	▮▮▮			No objection.

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DATED: April 15, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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By _____/s/ Andrew H. Schapiro_____
Andrew H. Schapiro

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Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com

7

Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com

8

191 N. Wacker Drive, Suite 2700
Chicago, IL 60606

9

Telephone: (312) 705-7400
Facsimile: (312) 705-7401

10

11

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com

12

Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com

13

555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065

14

Telephone: (650) 801-5000
Facsimile: (650) 801-5100

15

16

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com

17

Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com

18

Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com

19

Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com

20

865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017

21

Telephone: (213) 443-3000
Facsimile: (213) 443-3100

22

23

24

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com

25

51 Madison Avenue, 22nd Floor
New York, NY 10010

26

Telephone: (212) 849-7000
Facsimile: (212) 849-7100

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Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Attorneys for Defendant Google LLC

Case No. 4:20-cv-03664-YGR-SVK
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